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[additional counsel listed on signature page]

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

E.P., K.R., C.R., D.C., A.L., and B.G.,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

PROVIDENCE ST. JOSEPH HEALTH;
PROVIDENCE HEALTH & SERVICES;
PROVIDENCE HEALTH & SERVICES –
OREGON; PROVIDENCE WILLAMETTE
FALLS MEDICAL CENTER; PROVIDENCE
PORTLAND MEDICAL CENTER; OREGON
ANESTHESIOLOGY GROUP; LEGACY
HEALTH; and LEGACY MOUNT HOOD
MEDICAL CENTER,

Defendants.

Case No. 3:24-cv-01215-JR

**DEFENDANTS' JOINT UNOPPOSED
MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

LR 7-1 CERTIFICATE OF CONFERRAL

Pursuant to LR 7-1(a), counsel for defendants Providence St. Joseph Health, Providence Health & Services, Providence Health & Services – Oregon, Providence Willamette Falls Medical Center, Providence Portland Medical Center, Legacy Health, Legacy Mount Hood Medical Center, and Oregon Anesthesiology Group (“Defendants”) certify that they conferred with counsel for plaintiffs E.P., K.R., C.R., D.C., A.L., and B.G. (“Plaintiffs”) before filing this Motion, and Plaintiffs’ counsel has no objection.

MOTION

Pursuant to Fed. R. Civ. P. 6(b) and LR 16-3, Defendants move for a further extension of time to respond to the FAC filed by Plaintiffs. In support of this Motion, the Defendants state as follows:

1. Plaintiffs filed the original Complaint on July 26, 2024. (ECF No. 1.) Plaintiffs then filed the First Amended Class Action Complaint on July 31, 2024. (ECF No. 7.)
2. Defendants had previously filed motions for an extension of time to respond to the FAC (ECF Nos. 14, 17, 19), which were granted (ECF Nos. 15, 21). All Defendants currently have a date of September 27, 2024 to respond to the FAC.
3. The Defendants now seek a 34-day extension of the September 27, 2024, deadline to respond to the FAC, up to and including October 31, 2024.
4. There is good cause for the further extension sought by the Defendants.¹ The factual complexity and nature of the allegations and claims involve investigation before a response can be filed. This Motion is not made for purposes of delay.

¹ The Defendants reserve any right, defense, affirmative defense, claim, or objection in this matter.

DATED: September 16, 2024

K&L GATES LLP

STOEL RIVES LLP

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*Attorneys for Defendant Oregon
Anesthesiology Group*

Pursuant to L.R. 11-1(b), I hereby attest that the above signatories, on whose behalf this filing is jointly submitted, concur in this filing's contents and have authorized the filing of this document.

DATED: September 16, 2024

s/ Elizabeth H. White
Elizabeth H. White

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served on September 16, 2024, with a copy of the foregoing document via the Court's CM/ECF system.

DATED: September 16, 2024

By: /s/ Elizabeth H. White
Elizabeth H. White